

Appendix A to November Joint Status Report

Defendant	Production as of 9/6	Additional Production as of 10/4 ¹	Additional Production as of 11/1
AIR Communities	* ²	*75	*
Allied Orion	448		
Apartment Management Consultants	81	92	
Avenue5	*	*	*
Bell Partners	17 ³	21	
BH Management	264		144
Bozzuto Management	370 ⁴	26,583	
Brookfield	10		
Camden Property Trust	56,778	9	
CH Carter-Haston	4		1
ConAm	11	27⁵	
CONTI	*	*	*
Cortland	135,709		1
CWS	44	3	691
Dayrise	27		
ECI Management, LLC	59	38	
Equity Residential	4,887	1	
Essex	138	100	49,701
First Communities	15,116	9	
FPI Management	11*	*	*
Greystar	11 ⁶	686,286	
Highmark Residential	11,207	126,789	
IRT	17		
Kairoi	24		

¹ Going forward, any new footnotes (*i.e.*, those addressing information in the current joint status report) will be in bold.

² A * denotes Defendants for whom discovery is stayed pending settlement negotiations or who have reached settlements in principle.

³ Bell Partners is producing its only government production, a CID response to the Washington DC AG, prior to the September 13, 2024, status conference.

⁴ By the September 13, 2024 status conference, Bozzuto will have produced nearly 20,000 documents to Plaintiffs.

⁵ This entry and the total production number as of October 4, 2024 have been updated to account for an overlooked document from ConAm's earlier productions.

⁶ By the September 13, 2024, status conference, Greystar will have produced over 127,000 documents to Plaintiffs, and intends to make an even larger production before the October 12, 2024, status conference.

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Defendant	Production as of 9/6	Additional Production as of 10/4 ¹	Additional Production as of 11/1
Knightvest	12		
Lantower	18		
Lincoln Property Co. (Willow Bridge)	33,027	117,933	96,280
MAA	6 ⁷	38,237	
Mission Rock	385		
Morgan Properties	229		
Pinnacle	*	*	*
Prometheus	11	10	
RealPage	821,386	6,315	
Rose Assocs	39 ⁸	14	18
RPM	43,662	17,061	23,206
Sares Regis	256	1	
Security Properties	81,698		
Sherman	129		
Simpson	22		1,611
Thoma Bravo	1,080	500	1,572
The Related Cos	5	110	6
Thrive Communities	17 ⁹		8
Trammell Crow and Crow Holdings	331		
UDR	1,050	101,348	116,865
Windsor	225,530		
Winn	132	509	
ZRS	149		
TOTAL:	1,434,407	1,122,071	290,104

⁷ MAA intends to make a production of over 30,000 documents as early as today (September 6, 2024), and a second sizable production next week.

⁸ Rose has produced 39 documents (1,923 pages of documents), but Plaintiffs contend Rose's productions do not comply with the ESI order and therefore refer to this production as "2" documents here. The parties are working on resolving this issue. The parties have resolved this issue, as indicated in the chart above.

⁹ Thrive intends to supplement its document production prior to the September 13, 2024, status conference with a sizable production.